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U.S. District Court
Eastern District of MO

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ALICE WILLIAMS

Plaintiff,

V.

SONNY PERDUE

Secretary of Agriculture

Defendant,

CASE #: 4:17 CV-O1531 JAR

**PLAINTIFF'S RESPONSES TO DEFENDANTS SINGULAR REQUESTS FOR
ADMISSIONS**

COMES NOW, Plaintiff, Alice Williams, pro se, and files herewith her Responses and objections to Defendant singular, Request for Admission, Plaintiff states as follows:

I. PRELIMINARY STATEMENT

Plaintiff has not at this time, fully completed discovery and has not been availed to a full investigation in this action. All information contained herein is based solely upon such information and evidence as is presently available and known to Plaintiff upon information and belief at this time. Further discovery, investigation, research and analysis may supply additional information. As for these reasons, Plaintiff hereby so reserves the right to amend the responses herein as additional facts are ascertained, research completed and analysis undertaken.

II. GENERAL OBJECTIONS

Plaintiff objects to the Requests that seeks to impose any requirement or discovery obligation greater than or different from those under the Federal Rules of Civil Procedure and or the Rules of this Court.

PLAINTIFF'S RESPONSES TO DEFENDANT'S SINGULAR REQUEST FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that the allegations of discrimination contained within Plaintiff's First Amended Complaint (Doc. # 13-1) are limited to her disagreement with the Final Agency Decision (RD-2015-00832) (Doc. # 12-4, Exhibit D to Defendant's Motion to Dismiss) which assessed allegations of discrimination related to Plaintiff's non-selection for the GS-0510-07/09 Pathways Recent Graduates(Accountant) positions advertised under Vacancy Announcement STL-HR-2015-0829.

ANSWER:

Plaintiff objects on the ground said request, poses a question of alleged fact and seeks a response that is purely a question or conclusion of law which is improper in its form. Additionally, the request lacks foundation as it incorrectly assumes facts not in evidence, in that, Defendant seeks to have Plaintiff agree to an improperly overly restrictive aspect of the case. Defendant seeks to have Plaintiff agree to waive claims that are part and parcel to claims that fall within the broad claims that can be brought under civil suit in federal courts. Plaintiff is not required to do so and such a request is improper. A Plaintiff's scope of her lawsuit may be as broad as the scope of the administrative investigation which could reasonably be expected to grow out of the charge of discrimination. *EEOV V. Delight Wholesale Co.*, 973 F.2d 664,669 (8th Cir 1992).

Plaintiff admits only that, the allegations of discrimination contained within her First Amended Complaint include information regarding the dispute documented by Defendant in its self serving Decision RD-2015-00832. Plaintiff clearly alleged discrimination based upon Race, Disparate Treatment, Retaliation, Age and failure to promote. Plaintiff's First Amended Complaint includes the same nature complaints as her Administrative complaint. However,

Denies all other aspects of this request. In that it improperly limits Plaintiffs' Claims that can be resolved in the current lawsuit.

Respectfully submitted,

By: Alice F. Williams

Alice F. Williams
11309 Stonymont Dr.
St. Louis, MO 63136

Pro Se Plaintiff

Certificate of Service

I hereby certify that on this 12th day of January, 2018, the foregoing was served upon the opposing party of this cause of action, by delivery, deposited U.S.P.S. Postage Prepaid, addressed to:

Office of the United States Attorney
Jane Shaw
Assistant U.S. Attorney
111 S. 10th St., Room 20.333
St. Louis, MO 63102

By: Alice F. Williams
Alice F. Williams